

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

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MALCOLM ROSENWALD,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
LAURA S. UNGER, BENJAMIN R.	:	
CIVILETTI, WILLIAM H. JEWS, JAMES	:	
H. BERICK, MARY H. BOIES, BRUCE L.	:	
HAMMONDS, RANDOLPH C. LERNER,	:	Civil Action No. 05 CV 02296 CCB
STUART L. MARKOWITZ, WILLIAM H.	:	
MILSTEAD and THOMAS G.	:	
MURDOUGH, JR.,	:	
	:	
Defendants,	:	
	:	
MBNA CORPORATION,	:	
	:	
Nominal Defendant.	:	
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**UNOPPOSED MOTION FOR AN EXTENSION OF TIME
FOR DEFENDANTS TO RESPOND TO THE COMPLAINT**

Nominal defendant MBNA Corporation (“MBNA”) and defendants Laura S. Unger, Benjamin R. Civiletti, William H. Jews, James H. Berick, Mary H. Boies, Bruce L. Hammonds, Randolph C. Lerner, Stuart L. Markowitz, William H. Milstead and Thomas G. Murdough, Jr., (collectively, the “Individual Defendants”), by and through their undersigned attorneys, hereby request that this Court extend the time for defendants to answer, move to dismiss or otherwise respond to Plaintiff’s Complaint until Monday, September 26, 2005¹, and in support thereof, states as follows:

¹ The Defendants file this unopposed motion subject to, and without waiver of, any defenses the defendants may have including but not limited to lack of jurisdiction over the person.

1. Plaintiff filed this action in the Circuit Court for Baltimore City, Maryland, on July 11, 2005.

2. On August 19, 2005, Defendant Hammonds filed a Notice of Removal, removing this action from the Circuit Court to the United States District Court for the District of Maryland. Nominal Defendant MBNA and the other Individual Defendants consented to this removal.

3. On Friday, August 26, 2005, counsel for Plaintiff stated that Plaintiff does not oppose defendants' request for a 30-day extension of time to respond to Plaintiff's Complaint.

WHEREFORE, nominal defendant MBNA Corporation and defendants Laura S. Unger, Benjamin R. Civiletti, William H. Jews, James H. Berick, Mary H. Boies, Bruce L. Hammonds, Randolph C. Lerner, Stuart L. Markowitz, William H. Milstead and Thomas G. Murdough, Jr. respectfully request that this Court grant an extension of time for Defendants to answer, move to dismiss or otherwise respond to Plaintiff's Complaint until Monday, September 26, 2005.

Dated: August 29, 2005

By: _____/s/
Richard Brusca (Fed. Bar No. 22930)
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Stuart L. Markowitz, William H. Milstead and
Thomas G. Murdough, Jr.*

By: _____/s/
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*Attorneys for Nominal Defendant MBNA Corp.
and Defendant Bruce L. Hammonds*